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Attorneys for Secured Creditor
ARCHWAY BROADWAY LOAN SPE, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re
SEATON INVESTMENTS, LLC, *et al.*,

Debtors and Debtors-in-
Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and
2:24-bk-12076-VZ

Affects:

Chapter 11

- ☒ All Debtors
☐ Seaton Investments, LLC
☐ Colyton Investments, LLC
☐ Broadway Avenue Investments, LLC
☐ SLA Investments, LLC
☐ Negev Investments, LLC
☐ Alan Gomperts
☐ Daniel Halevy
☐ Susan Halevy

**EVIDENTIARY OBJECTIONS TO
DECLARATION OF STEVE GOLD IN
SUPPORT OF MOTION AUTHORIZING
DEBTOR TO ENTER INTO POST-
PETITION LEASE**

Date: December 12, 2024
Time: 11:00 a.m.
Crtrm.: 1368
255 E. Temple Street
Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

Secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability company, successor in interest to Archway Real Estate Income Fund I REIT, LLC (“Archway”) objects to, and moves to strike, the Declaration Of Steve Gold In Support Of Motion Authorizing Debtor To Enter Into Post-Petition Lease (“Gold Declaration”) (Dkt. 310-1) filed by these jointly administered debtors.

No.	Testimony	Objections/Motion to Strike
1.	Gold Declaration ¶ 2 2:8–9: “DMB has the expertise to manage and process grants, subsidies, and other government and NGO incentives (“Incentives”) available for private operators.”	Lack of Foundation (Fed. R. Evid. 602) The quoted testimony lacks foundation and should be stricken. Mr. Gold fails to establish how he knows what he is testifying to.

DATED: November 27, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.
MICHAEL GERARD FLETCHER
GERRICK M. WARRINGTON

By: /s/ Gerrick M. Warrington
GERRICK M. WARRINGTON
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